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September 13, 2022

Via ECF

Honorable Lee G. Dunst United States District Court, Eastern District of New York 100 Federal Plaza, Courtroom 830 Central Islip, New York 11722

Re: Patel et al v. Singh et al.

Case No: 2:21-cv-00759-JS-SIL

Joint Status Report

Dear Judge Dunst:

This firm represents Pratik Patel and Lalit Patel ("Plaintiffs") in reference to the above-captioned lawsuit. Pursuant to Your Order dated August 29, 2022, I am writing on behalf of all parties to provide Your Honor with a joint status report

At this time, the Parties propounded and responded to the other's written discovery requests and they have conducted depositions pursuant to Federal Rule of Civil Procedure 30.

On June 29, 2022, I served the defendants for the second request for production which remain outstanding

On March 6, 2022, I served Harvinder Dhody CPA PLLC with a subpoena for documents and records. Production remains outstanding.

On April 29, 2022, I served Bank of America, N.A. ("BoA") with subpoena for production of documents.

On May 27, 2022, the representative from BoA contacted me requesting an extension, which I granted. On June 21, 2022 the representative from BoA requested another extension which I granted.

On August 31, 2022, when no documents from BoA were forthcoming I contacted BoA and was told that since I requested Paycheck Protection Program information, the subpoena has

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been forwarded for compliance to the outside counsel. On September 13, 2022, I requested the information again and was provided with the same answer.

I do not believe an expert will be necessary in this matter.

Noddy Singh and Arjun Singh

On 6-16-22 Defendants served a demand for documents upon counsel for plaintiffs, said demand remains outstanding.

Defendants do not expect to call an expert to testify in this matter.

The parties are still awaiting decision on the Court's Order to Show Cause dated March 23, 2022.

Respectfully yours,

Alexander Kadochnikov

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Respectfully,